

EXHIBIT B  
TO  
OGLESBY DECL.

**To:** Alison Christian[achristian@cdslawfirm.com]  
**Cc:** Shelton, Shannon E (LDZX)[Shannon.E.Shelton@p66.com], Hall, Stephanie Y. (LDZX)[Stephanie.Y.Hall@p66.com]  
**From:** Oglesby, Matt H (LDZX)[/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=AECB58A890314E4CABB7D42FE453CEBB-OGLESBY, MA]  
**Sent:** Thur 7/4/2019 1:13:26 PM (UTC)  
**Subject:** FW: Webb/Major - Settlement Discussions

Alison,

I am passing along Keith Patton's latest settlement demand. The demand is down from his initial \$650,000 demand, which is good. However, Keith has put a short fuse on this demand.

Tomorrow will be two weeks past the date you indicated Phillips 66 would have Canal's full reservation of rights letter. Given that today is the Fourth of July, I don't expect that you will have issued the letter until after this week. Canal has had plenty of time to evaluate this claim, its policies, and because Phillips 66 has been as open with you as possible given the circumstances, the defenses that are available. I would hope that you have communicated all of this to your client so that we do not lose a chance to resolve this case before more legal fees are spent. On that note, I will forward a revised spreadsheet with all outstanding legal fees and expenses incurred by Phillips 66.

Matt

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**From:** Keith Patton [<mailto:keith@pattonlaw.com>]  
**Sent:** Wednesday, July 3, 2019 9:40 AM  
**To:** Young, Brett J. <[brett.young@nortonrosefulbright.com](mailto:brett.young@nortonrosefulbright.com)>  
**Subject:** Webb/Major - Settlement Discussions

Brett:

This is a confidential settlement communication and cannot be used for any other purpose.

As discussed, and in response to Conoco's offer of \$75,000.00, the target figure I am seeking from Conoco is \$300,000.00.

This case has a premises liability component and is therefore much different than both Zendejas and Lewis. Also, the value of the Conoco MSDS which says GASOLINE IS A CARCINOGEN is a part of the overall narrative which will help immensely at trial both against Conoco and all other defendants.

I will be sending corporate rep notices out on Monday for all defendants. Also, I will be sending a 1.5 page pre- Motion to Compel letter with regard to the benzene training videos discussed during Kleopfer's deposition.

This demand is WITHDRAWN as of 5:00 central on Tuesday, July 16, after which time I will not entertain settlement discussions until after the summary judgment phase, and the settlement figure I seek at that time will be much higher.

Your attention to this matter is appreciated.

KEITH E. PATTON  
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